

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HUISHAN CHEN

Plaintiff,

v.

ADEDIY AND THE OTHER
INDIVIDUALS, PARTNERSHIPS,
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A",

Defendants.

Case No. 2:24-cv-001516

Honorable Judge William S. Stickman

**DEFENDANTS' UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**

Defendants onlyYown, DragonDesignGifts, gogogosky, CustomSurprise, ADEDIY, AnnHomeArt, Artsadd, Personalizationc ("Defendants"), by and through its undersigned counsel, respectfully move this court for an extension of time, up to and February 14, 2025, for Defendants to answer or otherwise respond in this matter. In support thereof, Defendants state as follows:

1. Plaintiff commenced this suit by filing a Complaint on November 27, 2004
2. Plaintiff and Defendants have been conducting a good faith settlement negotiation, and additional time is needed to reach a settlement agreement.
3. Defendants request an extension of time until February 14, 2025, to answer, or otherwise respond to complaint in this matter.
4. Plaintiff has consented to this extension of time.
5. This is defendants' first extension of time request. This motion is brought in good faith and will not cause prejudice to the parties.

WHEREFORE, Defendants respectfully request this Court grant this unopposed motion a

and extent the deadline by which Defendant is to answer, or otherwise respond to, the
complaint in this matter, up to and including February 14, 2025

Dated: January 15, 2025

Respectfully submitted

By: /s/ Tianyu Ju

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Attorney for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2025, I electronically filed DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of Court using the CM/ECF system to the following:

Xiyan Zhang
Stratum Law LLC
2424 E. York St., Ste. 223
Philadelphia, PA, 19125
Counsel for Plaintiff

/s/ Tianyu Ju
Tianyu Ju